Appendix D



Best Management Practice Report – 2004

Water Supply & Reuse

Reporting Unit:	Year:
City of Pomona	2004
Water Supply Source Information	

Supply Source Name	Quantity (AF) Supplied	Supply Type
Three Valleys Municipal Water District	1210.9	Imported
Metropolitan Water District of Southern California	8040.8	Imported
Local	6713.984	Recycled
Local	1481.83	Local Watershed
Local	18112.44	Groundwater

Total AF: 35559.954

Accounts & Water Use

Reporting Unit Name:

City of Pomona

CUWCC

2004

02/24/2005

156782

A. Service Area Population Information:

1. Total service area population

B. Number of Accounts and Water Deliveries (AF)

Type	Metered		Unmetere	
	No. of Accounts	Water Deliveries (AF)	No. of Accounts	Water Deliveries (AF)
1. Single-Family	23878	12500	0	0
2. Multi-Family	2460	5026	0	0
3. Commercial	2903	5522	0	0
4. Industrial	147	620	0	0
5. Institutional	0	0	0	0
6. Dedicated Irrigation	417	1292	0	0
7. Recycled Water	0	0	0	0
8. Other	0	0	451	0
9. Unaccounted	NA	0 .	NA	0
Total	29805	24960	451	0

Metered

Reported as of 8/29/05

Unmetered

BMP 01: Water Survey Programs for Single-Family and Multi-Family Residential Customers

Reporting Unit: BMP Form Status: Year: City of Pomona 100% Complete 2004

A. Implementation

Based on your signed MOU date, 11/15/1996, your Agency STRATEGY DUE DATE is:
 Has your agency developed and implemented a targeting/ no marketing strategy for SINGLE-FAMILY residential water use surveys?

a. If YES, when was it implemented?

3. Has your agency developed and implemented a targeting/marketing strategy for MULTI-FAMILY residential water use surveys?

no.

a. If YES, when was it implemented?

B. Water Survey Data

Survey Counts:	Single Family Accounts	Multi-Family Units
1. Number of surveys offered:	0	0
2. Number of surveys completed:	0	0
Indoor Survey:		
Check for leaks, including toilets, faucets and meter checks	no	no
 Check showerhead flow rates, aerator flow rates, and offer to replace or recommend replacement, if necessary 	no	no
 Check toilet flow rates and offer to install or recommend installation of displacement device or direct customer to ULFT replacement program, as necesary; replace leaking toilet flapper, as necessary 	no	no
Outdoor Survey:		
Check irrigation system and timers	no	· no
7. Review or develop customer irrigation schedule	no	no
Measure landscaped area (Recommended but not required for surveys)	no	no
Measure total irrigable area (Recommended but not required for surveys)	no	no
 Which measurement method is typically used (Recommended but not required for surveys) 		None
11. Were customers provided with information packets that included evaluation results and water savings recommendations?	no	no
12. Have the number of surveys offered and completed, survey results, and survey costs been tracked?	no	no
a If you in what forms are assumed to also do		

- a. If yes, in what form are surveys tracked?
- b. Describe how your agency tracks this information.

C. Water Survey Program Expenditures

This Year Next Year

1. Budgeted Expenditures

- 0

2. Actual Expenditures

0

D. "At Least As Effective As"

1. Is your AGENCY implementing an "at least as effective as" variant of this BMP?

No

0

a. If YES, please explain in detail how your implementation of this BMP differs from Exhibit 1 and why you consider it to be "at least as effective as."

E. Comments

no

no

BMP 02: Residential Plumbing Retrofit

Reporting Unit: BMP Form Status: Year: City of Pomona 100% Complete 2004

A. Implementation

- 1. Is there an enforceable ordinance in effect in your service area requiring replacement of high-flow showerheads and other water use fixtures with their low-flow counterparts?
 - a. If YES, list local jurisdictions in your service area and code or ordinance in each:
- 2. Has your agency satisfied the 75% saturation requirement for single-family housing units?
 3. Estimated percent of single-family households with low-flow showerheads:
 4. Has your agency satisfied the 75% saturation requirement for multi-family housing units?
 5. Estimated percent of multi-family households with low-flow showerheads:
- 6. If YES to 2 OR 4 above, please describe how saturation was determined, including the dates and results of any survey research.

B. Low-Flow Device Distribution Information

- 1. Has your agency developed a targeting/ marketing strategy for distributing low-flow devices?
 - a. If YES, when did your agency begin implementing this strategy?
 - b. Describe your targeting/ marketing strategy.

Low-Flow Devices Distributed/ Installed	SF Accounts	MF Units
2. Number of low-flow showerheads distributed:	36	0
Number of toilet-displacement devices distributed:	0	0
4. Number of toilet flappers distributed:	0	0
5. Number of faucet aerators distributed:	0	0
6. Does your agency track the distribution and codevices?	ost of low-flow	yes

a. If YES, in what format are low-flow Manual Activity devices tracked?

b. If yes, describe your tracking and distribution system:

Low flow showerheads are used as giveaway items at the City's annual Public Works Week event. A manual tally is kept of showerheads distributed.

C. Low-Flow Device Distribution Expenditures

	This Year	Next Year
Budgeted Expenditures	1000	1000
2. Actual Expenditures	508	

D. "At Least As Effective As"

- 1. Is your AGENCY implementing an "at least as effective as" No variant of this BMP?
 - a. If YES, please explain in detail how your implementation of this BMP

differs from Exhibit 1 and why you consider it to be "at least as effective as."

E. Comments

BMP 03: System Water Audits, Leak Detection and Repair

Reporting Unit: BMP Form Status: Year: City of Pomona 100% Complete 2004

A. Implementation

- 1. Has your agency completed a pre-screening system audit for this reporting year?
- 2. If YES, enter the values (AF/Year) used to calculate verifiable use as a percent of total production:
 - a. Determine metered sales (AF)
 - b. Determine other system verifiable uses (AF)
 - c. Determine total supply into the system (AF)
 - d. Using the numbers above, if (Metered Sales + Other 0.00 Verifiable Uses) / Total Supply is < 0.9 then a full-scale system audit is required.
- 3. Does your agency keep necessary data on file to verify the values no used to calculate verifiable uses as a percent of total production?
- 4. Did your agency complete a full-scale audit during this report year?
- 5. Does your agency maintain in-house records of audit results or the completed AWWA audit worksheets for the completed audit?
- 6. Does your agency operate a system leak detection program?
 - a. If yes, describe the leak detection program:

B. Survey Data

Total number of miles of distribution system line.
 Number of miles of distribution system line surveyed.

C. System Audit / Leak Detection Program Expenditures

	-	This Year	Next Year
Budgeted Expenditures		0	0
2. Actual Expenditures		0	

D. "At Least As Effective As"

- 1. Is your AGENCY implementing an "at least as effective as" variant of this BMP?
 - a. If YES, please explain in detail how your implementation of this BMP differs from Exhibit 1 and why you consider it to be "at least as effective as."

E. Comments

BMP 04: Metering with Commodity Rates for all New Connections and Retrofit of Existing

Reporting Unit: BMP Form Status: Year: City of Pomona 100% Complete 2004 A. Implementation 1. Does your agency require meters for all new connections and bill yes by volume-of-use? 2. Does your agency have a program for retrofitting existing no unmetered connections and bill by volume-of-use? a. If YES, when was the plan to retrofit and bill by volume-ofuse existing unmetered connections completed? b. Describe the program: 3. Number of previously unmetered accounts fitted with meters 0 during report year. B. Feasibility Study 1. Has your agency conducted a feasibility study to assess the merits no of a program to provide incentives to switch mixed-use accounts to dedicated landscape meters? a. If YES, when was the feasibility study conducted? (mm/dd/yy) b. Describe the feasibility study: 2. Number of CII accounts with mixed-use meters. 0 3. Number of CII accounts with mixed-use meters retrofitted with 0 dedicated irrigation meters during reporting period. C. Meter Retrofit Program Expenditures

	This Year	Next Year
Budgeted Expenditures	0	0
2. Actual Expenditures	0	

D. "At Least As Effective As"

1. Is your AGENCY implementing an "at least as effective as" variant No of this BMP?

a. If YES, please explain in detail how your implementation of this BMP differs from Exhibit 1 and why you consider it to be "at least as effective

E. Comments

BMP 05: Large Landscape Conservation Programs and Incentives

Incentives			
Reporting Unit: City of Pomona		orm Status: Complete	Year: 2004
A. Water Use Budgets			
 Number of Dedicated In 	rigation Meter Acco	unts:	0
2. Number of Dedicated Irrigation Meter Accounts with Water Budgets:			0
Budgeted Use for Irrigation Meter Accounts with Water Budgets (AF):			0
Actual Use for Irrigation (AF):		-	0
Does your agency provi budgets each billing cycle'	ide water use notice ?	es to accounts with	no
B. Landscape Surveys			
 Has your agency develor for landscape surveys? 		-	no
a. If YES, when did strategy?	your agency begin	implementing this	
b. Description of ma	arketing / targeting	strategy:	
2. Number of Surveys Offe	ered.		0
Number of Surveys Cor	npleted.		0
4. Indicate which of the fol	lowing Landscape I	Elements are part of	your survey:
a. Irrigation System			no
b. Distribution Unifo			no
c. Review / Develop Irrigation Schedules			no
d. Measure Landscape Area			no
e. Measure Total Irrigable Area			no
f. Provide Customer Report / Information			no
5. Do you track survey offer			no
Does your agency provi completed surveys?	de follow-up survey	s for previously	no
a. If YES, describe	below:		
C. Other BMP 5 Actions			
 An agency can provide landscape budgets in lieu Does your agency provide budgets? 	of a large landscap	e survey program.	no
Number of CII mixed-us	e accounts with lar	idscape budgets.	0
3. Do you offer landscape	irrigation training?		no
 Does your agency offer landscape water use efficient 	financial incentives ency?	to improve	no
Type of Financial Incentive:	Budget (Dollars/ Year)	Number Awarded to Customers	Total Amount Awarded
a. Rebates	Ó	0	0
b. Loans	0	0	0

c. Grants	0	0	0
5. Do you provide landscape wanew customers and customers		mation to	No
a. If YES, describe below	v:		
6. Do you have irrigated landsc	aping at your facilities?		no
a. If yes, is it water-efficie	ent?		
b. If yes, does it have de	dicated irrigation meteri	ng?	no
7. Do you provide customer not season?	ices at the start of the ir	rigation	no
8. Do you provide customer not season?	tices at the end of the irr	rigation	no

D. Landscape Conservation Program Expenditures

	This Year	Next Year
Budgeted Expenditures	0	0
2. Actual Expenditures	0	
E. "At Least As Effective As"		
1. Is your AGENCY implementing an "at least as effect	tive as"	No

variant of this BMP?

a. If YES, please explain in detail how your implementation of this BMP

a. If YES, please explain in detail how your implementation of this BMP differs from Exhibit 1 and why you consider it to be "at least as effective as."

F. Comments

BMP 06: High-Efficiency Washing Machine Rebate Programs

Reporting Unit: BMP Form Status: Year: City of Pomona 100% Complete 2004

A. Implementation

1. Do any energy service providers or waste water utilities in your service area offer rebates for high-efficiency washers?

a. If YES, describe the offerings and incentives as well as who the energy/waste water utility provider is.

2. Does your agency offer rebates for high-efficiency washers?3. What is the level of the rebate?4. Number of rebates awarded.

B. Rebate Program Expenditures

	This Year N	ext Year
1. Budgeted Expenditures	0	0
2. Actual Expenditures	0	

C. "At Least As Effective As"

1. Is your AGENCY implementing an "at least as effective as" no variant of this BMP?

a. If YES, please explain in detail how your implementation of this BMP differs from Exhibit 1 and why you consider it to be "at least as effective as."

D. Comments

BMP 07: Public Information Programs

Reporting Unit: BMP Form Status: Year: City of Pomona 100% Complete 2004

A. Implementation

1. Does your agency maintain an active public information program to promote and educate customers about water conservation?

yes

a. If YES, describe the program and how it's organized.

Information is provided periodically with the City utility bills.

2. Indicate which and how many of the following activities are included in your public information program.

Public Information Program Activity	Yes/No	Number of Events
a. Paid Advertising	no	
b. Public Service Announcement	no	
c. Bill Inserts / Newsletters / Brochures	no	
 d. Bill showing water usage in comparison to previous year's usage 	no	
e. Demonstration Gardens	no	
f. Special Events, Media Events	no	
g. Speaker's Bureau	no	
 h. Program to coordinate with other government agencies, industry and public interest groups and media 	no	

B. Conservation Information Program Expenditures

	This Year	Next Year
1. Budgeted Expenditures	0	0
2. Actual Expenditures	0	

C. "At Least As Effective As"

1. Is your AGENCY implementing an "at least as effective as" No variant of this BMP?

a. If YES, please explain in detail how your implementation of this BMP differs from Exhibit 1 and why you consider it to be "at least as effective as "

D. Comments

BMP 08: School Education Programs

Reporting Unit:

BMP Form Status:

Year:

City of Pomona

100% Complete

2004

A. Implementation

1. Has your agency implemented a school information program to promote water conservation?

yes

2. Please provide information on your school programs (by grade level):

Grade	_	No. of class presentations	students	No. of teachers' workshops
Grades K-3rd	yes	1	20	0
Grades 4th-6th	yes	0	0	0
Grades 7th-8th	no	0	0	0
High School	no	0	0	0
Did your Agency's mater requirements?	ials meet state	education frame	ework	yes
4. When did your Agency b	egin implement	ing this progran	1?	07/01/1999

B. School Education Program Expenditures

	This Year	Next Year
Budgeted Expenditures	0	0
2. Actual Expenditures	0	

C. "At Least As Effective As"

1. Is your AGENCY implementing an "at least as effective as" No variant of this BMP?

a. If YES, please explain in detail how your implementation of this BMP differs from Exhibit 1 and why you consider it to be "at least as effective as."

D. Comments

Reporting Unit: BMP Form Status: Year:

City of Pomona 100% Complete 2004

A. Implementation

1. Has your agency identified and ranked COMMERCIAL customers according to use?

2. Has your agency identified and ranked INDUSTRIAL no customers according to use?

3. Has your agency identified and ranked INSTITUTIONAL no customers according to use?

Option A: CII Water Use Survey and Customer Incentives Program

4. Is your agency operating a CII water use survey and customer incentives program for the purpose of complying with BMP 9 under this option?

CII Surveys	Commercial Accounts	Industrial Accounts	Institutional Accounts
a. Number of New Surveys Offered	0	0	0
b. Number of New Surveys Completed	0	0	0
c. Number of Site Follow-ups of Previous Surveys (within 1 yr)	0	0	0
d. Number of Phone Follow- ups of Previous Surveys (within 1 yr)	0	0	0

CII Survey Components	Commercial Accounts	Industrial Accounts	Institutional Accounts
e. Site Visit	no ·	no	no
f. Evaluation of all water- using apparatus and processes	no	no	no
g. Customer report identifying recommended efficiency measures, paybacks and agency incentives	no	no	no

Agency CII Customer Incentives	Budget (\$/Year)	No. Awarded to Customers	Total \$ Amount Awarded
h. Rebates	0	0	0
i. Loans	0	0	0
j. Grants	0	0	0
k. Others	0	0	0
Section of the sectio	NAME OF STREET		

Option B: CII Conservation Program Targets

5. Does your agency track CII program interventions and water savings for the purpose of complying with BMP 9 under this option?

no

6. Does your agency document and maintain records on how savings were realized and the method of calculation for estimated savings?	no
7. Estimated annual savings (AF/yr) from site-verified actions taken by agency since 1991.	0
8. Estimated annual savings (AF/yr) from non-site-verified actions taken by agency since 1991.	0

B. Conservation Program Expenditures for CII Accounts

	This Year	Next Year
1. Budgeted Expenditures	0	0
2. Actual Expenditures	0	

C. "At Least As Effective As"

1. Is your AGENCY implementing an "at least as effective as" No variant of this BMP?

a. If YES, please explain in detail how your implementation of this BMP differs from Exhibit 1 and why you consider it to be "at least as effective as."

D. Comments

Staffing shortages do not allow for an active CII program at this time.

BMP 09a: CII ULFT Water Savings

Reporting Unit:

BMP Form Status:

Year:

City of Pomona

100% Complete

2004

1. Did your agency implement a CII ULFT replacement program in the reporting year? If No, please explain why on Line B. 10.

No

A. Targeting and Marketing

1. What basis does your agency use to target customers for participation in this program? Check all that apply.

- a. Describe which method you found to be the most effective overall, and which was the most effective per dollar expended.
- 2. How does your agency advertise this program? Check all that apply.
 - a. Describe which method you found to be the most effective overall, and which was the most effective per dollar expended.

B. Implementation

1. Does your agency keep and maintain customer participant information? (Read the Help information for a complete list of all the information for this BMP.)

2. Would your agency be willing to share this information if the CUWCC did a study to evaluate the program on behalf of your agency?

3. What is the total number of customer accounts participating 0 in the program during the last year?

CII Subsector

Number of Toilets Replaced

4. Standard Air Valve Floor Valve Wall Gravity Tank Assisted Mount Mount

- a. Offices
- b. Retail / Wholesale
- c. Hotels
- d. Health
- e. Industrial
- f. Schools: K to 12
- g. Eating
- h. Government
- i. Churches
- j. Other
- 5. Program design.
- 6. Does your agency use outside services to implement this program?

No

a. If yes, check all that apply.

- 7. Participant tracking and followup.
- 8. Based on your program experience, please rank on a scale of 1 to 5, with 1 being the least frequent cause and 5 being the most frequent cause, the following reasons why customers refused to participate in the program.
- a. Disruption to business
- b. Inadequate payback
- c. Inadequate ULFT performance
- d. Lack of funding
- e. American's with Disabilities Act
- f. Permitting
- g. Other. Please describe in B. 9.
- 9. Please describe general program acceptance/resistance by customers, obstacles to implementation, and other isues affecting program implementation or effectiveness.
- 10. Please provide a general assessment of the program for this reporting year. Did your program achieve its objectives? Were your targeting and marketing approaches effective? Were program costs in line with expectations and budgeting?

Staffing shortages do not allow us to have an active CII program at this time.

C. Conservation Program Expenditures for CII ULFT

1. CII ULFT Program: Annual Budget & Expenditure Data

	Budgeted	Actual Expenditure
a. Labor	0	0
b. Materials	0	0
c. Marketing & Advertising	0	0
d. Administration & Overhead	0	0
e. Outside Services	0	0
f. Total	0	0
ogram: Annual Cost Sharing		

2. CII ULFT Program: Annual Cost Sharing

a. Wholesale agency contribution	0
b. State agency contribution	0
c. Federal agency contribution	0
d. Other contribution	0
e. Total	0

D. Comments

CUWCC | Print All Page 18 of 23

BMP 11: Conservation Pricing

Reporting Unit:

City of Pomona

BMP Form
Year:

Status:
2004

A. Implementation

Rate Structure Data Volumetric Rates for Water Service by Customer Class

1. Residential

a. Water Rate Structure Increasing Block

b. Sewer Rate Structure Uniform

c. Total Revenue from Volumetric Rates \$0

d. Total Revenue from Non-Volumetric

Charges, Fees and other Revenue \$0

Sources

2. Commercial

a. Water Rate Structure Increasing Block

b. Sewer Rate Structure Uniform

c. Total Revenue from Volumetric Rates \$0

d. Total Revenue from Non-Volumetric

Charges, Fees and other Revenue \$

Sources

\$0

3. Industrial

a. Water Rate Structure Increasing Block

b. Sewer Rate Structure Uniform

c. Total Revenue from Volumetric Rates \$0

d. Total Revenue from Non-Volumetric

Charges, Fees and other Revenue \$0

Sources

4. Institutional / Government

a. Water Rate Structure Increasing Block

b. Sewer Rate Structure Uniform

c. Total Revenue from Volumetric Rates \$0

d. Total Revenue from Non-Volumetric
Charges, Fees and other Revenue \$0

Sources

5. Irrigation

a. Water Rate Structure Increasing Block

b. Sewer Rate Structure Uniform

c. Total Revenue from Volumetric Rates \$0

d. Total Revenue from Non-Volumetric

Charges, Fees and other Revenue \$0

Sources

6. Other

a. Water Rate Structure Increasing Block

b. Sewer Rate Structure Uniform

c. Total Revenue from Volumetric Rates \$0

1.7.1.5

d. Total Revenue from Non-Volumetric Charges, Fees and other Revenue \$0

Sources

Ψ

B. Conservation Pricing Program Expenditures

	This Year	Next Year
Budgeted Expenditures	0	0
2. Actual Expenditures	0	
t Least As Effective As"		

C. "At Least As Effective As'

1. Is your AGENCY implementing an "at least as effective as" No variant of this BMP?

a. If YES, please explain in detail how your implementation of this BMP differs from Exhibit 1 and why you consider it to be "at least as effective as."

D. Comments

BMP 12: Conservation Coordinator

Reporting Unit: BMP Form Status: Year: 100% Complete 2004 City of Pomona

A. Implementation

yes 1. Does your Agency have a conservation coordinator? 2. Is this a full-time position? no 3. If no, is the coordinator supplied by another agency with which no you cooperate in a regional conservation program?

4. Partner agency's name:

5. If your agency supplies the conservation coordinator:

a. What percent is this conservation 25% coordinator's position? b. Coordinator's Name Vince Carstensen Utility Resource Efficiency c. Coordinator's Title Coordinator d. Coordinator's Experience and Number of 3.0

e. Date Coordinator's position was created

09/27/1999 (mm/dd/yyyy)

6. Number of conservation staff, including Conservation Coordinator.

B. Conservation Staff Program Expenditures

	This Year	Next Year
1. Budgeted Expenditures	31961	34915
2. Actual Expenditures	20613	

C. "At Least As Effective As"

1. Is your AGENCY implementing an "at least as effective as" no variant of this BMP?

a. If YES, please explain in detail how your implementation of this BMP differs from Exhibit 1 and why you consider it to be "at least as effective as."

D. Comments

BMP 13: Water Waste Prohibition Reporting Unit: BMP Form Status: Year: City of Pomona 2004 100% Complete A. Requirements for Documenting BMP Implementation 1. Is a water waste prohibition ordinance in effect in your service yes area? a. If YES, describe the ordinance: Ordinance is strictly voluntary by residents. 2. Is a copy of the most current ordinance(s) on file with CUWCC? no a. List local jurisdictions in your service area in the first text box and water waste ordinance citations in each jurisdiction in the second text The first violation is The City of Pomona educational. **B.** Implementation 1. Indicate which of the water uses listed below are prohibited by your agency or service area. a. Gutter flooding yes b. Single-pass cooling systems for new connections yes c. Non-recirculating systems in all new conveyor or car wash yes systems d. Non-recirculating systems in all new commercial laundry yes systems e. Non-recirculating systems in all new decorative fountains yes f. Other, please name yes We allow gray water for irrigation. 2. Describe measures that prohibit water uses listed above: Voluntary compliance. Water Softeners: 3. Indicate which of the following measures your agency has supported in developing state law: a. Allow the sale of more efficient, demand-initiated no regenerating DIR models. b. Develop minimum appliance efficiency standards that: i.) Increase the regeneration efficiency standard to at least 3,350 grains of hardness removed per pound of no common salt used. ii.) Implement an identified maximum number of gallons no discharged per gallon of soft water produced. c. Allow local agencies, including municipalities and special districts, to set more stringent standards and/or to ban on-site regeneration of water softeners if it is demonstrated and found no by the agency governing board that there is an adverse effect on the reclaimed water or groundwater supply. 4. Does your agency include water softener checks in home water no

audit programs?

5. Does your agency include information about DIR and exchangetype water softeners in educational efforts to encourage replacement of less efficient timer models?

no

C. Water Waste Prohibition Program Expenditures

Next

	This Year	Year
1. Budgeted Expenditures	0	0
2. Actual Expenditures	0	

D. "At Least As Effective As"

1. Is your AGENCY implementing an "at least as effective as" variant of this BMP?

a. If YES, please explain in detail how your implementation of this BMP differs from Exhibit 1 and why you consider it to be "at least as effective as "

E. Comments

BMP 14: Residential ULFT Replacement Programs

Reporting Unit: BMP Form Status: Year: City of Pomona 100% Complete 2004

A. Implementation

	Single- Family Accounts	Multi- Family Units
1. Does your Agency have program(s) for replacing high-water-using toilets with ultra-low flush toilets?	yes	no

Number of Toilets Replaced by Agency Program During Report Year

Replacement Method	SF Accounts	MF Units
2. Rebate	0	0
3. Direct Install	0	0
4. CBO Distribution	499	0
5. Other	0	0
	papers, and the second gar papers space and the second second second second second second second second second	
To	otal 499	0

6. Describe your agency's ULFT program for single-family residences.

Periodic distribution events are provided for residents.

7. Describe your agency's ULFT program for multi-family residences.

None.

- 8. Is a toilet retrofit on resale ordinance in effect for your service no area?
- 9. List local jurisdictions in your service area in the left box and ordinance citations in each jurisdiction in the right box:

B. Residential ULFT Program Expenditures

	This Year	Next Year
Budgeted Expenditures	60000	0
2. Actual Expenditures	51647	

C. "At Least As Effective As"

- 1. Is your AGENCY implementing an "at least as effective as" no variant of this BMP?
 - a. If YES, please explain in detail how your implementation of this BMP differs from Exhibit 1 and why you consider it to be "at least as effective as."

D. Comments